

1 Anthony Paronich  
2 **Paronich Law, P.C.**  
3 350 Lincoln Street, Suite 2400  
4 Hingham, MA 02043  
5 (508) 221-1510  
6 anthony@paronichlaw.com  
7 Counsel for Plaintiff

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

WYATT BULS, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

DHTLA MOTORS, LLC d/b/a  
HYUNDAI OF DOWNTOWN LA,  
Defendant.

Case No. 2:25-cv-03128

**DECLARATION OF ANTHONY  
PARONICH IN RESPONSE TO  
RULE TO SHOW CAUSE RE  
SANCTIONS**

**DECLARATION OF ANTHONY PARONICH IN RESPONSE TO ORDER**  
**TO SHOW CAUSE RE SANCTIONS**

I, Anthony Paronich, declare as follows:

1. I am the Principal of Paronich Law, P.C. and counsel of record for Plaintiff in this matter. I submit this declaration in response to the Court's June 12, 2025 Order to Show Cause re Sanctions. [ECF 22].

**2. Persons Responsible for Meeting with Opposing Counsel:**  
I conducted the Rule 26(f) conference with defense counsel and served as the primary point of contact for that discussion. I also participated in subsequent communications with opposing counsel and with co-counsel, including Cassandra P. Miller and Carly Roman of Strauss Borrelli PLLC, regarding the drafting and finalization of the Joint Rule 26(f) Report and Schedule of Pretrial and Trial Dates. All communications with defense counsel were professional, and the Parties cooperated in good faith throughout the process.

**3. Persons Responsible for Preparing, Reviewing, and Ensuring Accuracy and Compliance:** Cassandra Miller, Partner at Strauss Borrelli PLLC (admitted *pro hac vice*), was primarily responsible for preparing the initial draft of the Joint Report and Schedule. I reviewed and revised the report and schedule as drafts were exchanged between counsel to ensure compliance with the Court's Order Setting Scheduling Conference. Carly Roman also participated in reviewing and coordinating the final version for filing.

**4. Why the Report Failed to Comply with the Court's Order:**  
Unfortunately, during the exchange of multiple drafts between Plaintiff's counsel

1 and with defense counsel, certain proposed dates were inadvertently modified in  
2 ways that resulted in noncompliance with the Court's calendaring directives. For  
3 example, the trial date was mistakenly changed from April 6, 2027 (a Tuesday) to  
4 April 6, 2026 (a Monday), which caused cascading changes to other deadlines—  
5 some of which no longer fell on the correct weekday or otherwise failed to comply  
6 with the Court's directives.

7 5. Ms. Miller had reviewed a prior version of the Schedule that was  
8 compliant, and mistakenly believed the modified version still complied. These  
9 errors were unintentional and not caught during the final review process.

10 6. In addition, certain sections required by the Court—such as anticipated  
11 deponents and corporate affiliations—were inadvertently omitted from the  
12 originally filed report.

13 7. **Corrective Actions and Apology:** After receiving the Court's Order  
14 to Show Cause, Plaintiff's counsel promptly met again with defense counsel to  
15 carefully review and revise the Joint Report and Schedule. The Parties have since  
16 agreed on a corrected set of proposed deadlines and revisions. We believe the  
17 revised filing complies fully with the Court's format, calendaring, and content  
18 requirements.

19 8. I sincerely apologize to the Court for the oversight and any resulting  
20 inconvenience. The errors were inadvertent and the result of coordination and  
21 revision issues during drafting. I take the Court's rules and orders seriously and will  
22 ensure full compliance going forward.

23 9. I respectfully request that the Court accept this declaration and the

1 corrected filing as our response to the Order to Show Cause and that no sanctions  
2 be imposed.

3 I declare under penalty of perjury under the laws of the United States that the  
4 foregoing is true and correct.

5 Executed on June 18, 2025, in Hingham, Massachusetts.

6 Respectfully submitted,  
7 /s/ Anthony Paronich  
8 **Anthony Paronich**  
9 Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
(508) 221-1510  
10 anthony@paronichlaw.com  
11 Counsel for Plaintiff  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

**CERTIFICATE OF SERVICE**

I, Anthony Paronich, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 18th day of June, 2025.

By: /s/ Anthony Paronich  
**Anthony Paronich**  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
(508) 221-1510  
anthony@paronichlaw.com  
Counsel for Plaintiff

*Counsel for Plaintiff Buls*